## AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Justin Blais, a Special Agent with the Bureau of Alcohol, Tobacco and Firearms, being first duly sworn, does hereby depose and state as follows:

## INTRODUCTION AND AGENT BACKGROUND

- I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), and have been since 2017. Prior to joining the ATF I worked as a full-time police officer in Farmington, Maine. I currently work out of the ATF Maine Field Office in Bangor, Maine. In my capacity as an ATF Special Agent, my duties include conducting criminal investigations concerning alleged violations of the Federal firearms laws, including those dealing with prohibited individuals in possession and acquisition of firearms. I have acquired knowledge and experience as to firearms and ammunition due to investigations, research, records, familiarity, conferring with other experts, training, teaching, and certifications. I base this affidavit on my own investigation, my personal knowledge, and my training and experience, as well as discussions with other law enforcement personnel and my reading of investigative reports and review of documentary and tangible evidence.
- 2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, my review of documents, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and warrant and does not purport to set forth all my knowledge of or investigation into this matter.

3. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that a violation of Title 18, United States Code, Section 922(a)(6), False Statement Made During Purchase of a Firearm, has been committed by CALEB RHINE ("RHINE").

## STATEMENT OF PROBABLE CAUSE

- 4. On June 8, 2023, RHINE was indicted in Hancock County Superior Court on one count of Aggravated Trafficking in Scheduled Drugs, a Class A Felony, in violation of Title 17-A M.R.S. §1105-a(1)(K), Docket Number HANCD-CR-2023-00627.
- 5. On June 14, 2023, RHINE was arraigned on this indictment. RHINE was present at the arraignment and represented by Hunter Tzovarras, Esq. The docket record and audio recording of the arraignment indicate that RHINE was informed of the charge in the June 8, 2023 indictment and pled not guilty. He was also informed of the minimum and maximum penalties associated with the charge. A superseding indictment was filed on April 10, 2025. The case remains open.
- 6. On May 9, 2024, RHINE purchased a Taurus, Model G2C, pistol with serial number AEE400721 from Willey's Sport Shop in Ellsworth, Maine, a federally licensed firearms dealer.
- 7. In connection with his purchase, RHINE filled out an ATF Form 4473 and provided his driver's license to Willey's Sports Shop. I have spoken to a representative from Willey's Sports Shop who confirmed that the store verifies that the individual purchasing the gun and filling out the ATF Form 4473 is the same individual from the driver's license. On the form, RHINE provided his name, address, date of birth, driver's license number, and the name and serial number of the gun he was purchasing. In addition, in response to question 21.c. on the form, "Are you under indictment or

information in any court for a felony, or any other crime for which the judge could imprison you for more than one year...?," RHINE checked the box "No." RHINE then signed and dated the form May 5, 2024.

- On April 10, 2025, at approximately 10:30pm, law enforcement responded 8. to an automated 911 call from an iPhone reporting that the phone detected it was in a crash in Blue Hill, Maine. The phone number was assigned to RHINE.
- Upon arrival at the scene, law enforcement located a rolled over 9. automobile registered to RHINE. There was no one present in the automobile which smelled strongly of alcoholic beverages. The vehicle suffered catastrophic damage to all sides and all the airbags deployed.
- Inside the vehicle, law enforcement located the phone that made the 911 10. call and a wallet containing a Maine driver's license in the name of RHINE. Law enforcement also located a Taurus, Model G2C, pistol with serial number AEE400721.
- As a result of the crash, RHINE was charged via complaint in Hancock 11. County Superior Court with (1) Leaving the Scene of an Accident Involving Personal Injury, (2) Failure to Report an Accident; (3) Violation of Condition of Release, and (4) Driving to Endanger.

## **CONCLUSION**

Based on the forgoing, there is probable cause to believe that a violation of Title 18, United States Code, Section 924(a)(6), False Statement Made During Purchase of a Firearm, has been committed by CALEB RHINE ("RHINE").

Respectfully submitted,

Justin Blais Special Agent ATF

Sworn to telephonically and signed electronically in accordance with the requirements of Rule 4.1 of the Federal Rules of Criminal Procedure

May 29 2025

Bangor, ME City and state:

John C Niwson U.S. Magistrate Judge